(f) Letter reports, including photographs, will be provided to the U.S. EPA on any field oversight activities, including split sampling.

## 5. Schedule for Task Completion:

- (a) Provide the U.S. EPA with written comments on the draft and final RFI and CMS reports, or Intermim Measures report within 30 days of receipt.
- (b) Provide comments on Envirosafe's progress reports within 15 days of receipt of the report.
- (c) Provide EPA with reviews of any reports or plans within 30 days of receipt of the plans or reports.
- (d) Provide the U.S. EPA with written comments on the draft and final RFI, CMS and Interim Measures workplans within 30 days of receipt.
- (e) Provide the U.S. EPA with letter reports on field oversight activities within 15 days of receipt.
- (f) Provide the U.S. EPA with all sampling data information along with data validation summary within 30 days after receipt of analytical results.

## Anticipated Travel Requirements:

Travel will be required to the Envirosafe facility periodically during the RFI, CMS Interim Measures and Stabilization activities. Travel associated with collection of split samples will be conducted at the same time as the oversight activities.

#### 7. Level of Effort:

The estimated level of effort to complete this work assignment is 1000 hours.

The U.S. EPA primary contact is Thomas Matheson, at (312) 886-7569.

# STATEMENT OF WORK CHEMICAL WASTE MANAGEMENT, INC. VICKERY, OHIO OHD 020 273 819

## 1. Objective:

The objectives of this NEPA contract are:

- (a) To obtain the services of an environmental professional who is experienced in evaluating the technical aspects of corrective action alternatives at hazardous waste sites. The professional will be responsible for reviewing and providing comments on the technical aspects of workplans and reports developed by Chemical Waste Management, Inc. (CWM-Vickery), as part of the corrective action activity at the site;
- (b) To obtain the services of one or more persons experienced in field activities associated with corrective action investigations and remediations. This person(s) will be responsible for over-sight and inspection of field activities associated with the RFI, CMS and any interim measures at the site: and
- (c) To obtain the services of an expert hydrogeologist, to review and comment on corrective action activities to be conducted by CWM-Vickery under the terms of the Federal RCRA permit. This expert must also be capable of presenting expert testimony.
- (d) To collect split samples from the sampling team during field activities and the submittal of those samples to a Regionally approved CLP lab for analysis. Data validation is also included in the task assignment.

## 2. Background:

The CWM-Vickery facility operates as a treatment, storage, and disposal facility for liquid hazardous wastes. The facility property encompasses 437 acres. The facility operations are conducted on 97 acres and the remainder is rented out as farmland. The wastes are stored and treated in above ground tanks, filtered, blended, and disposed of by deep well injection through four Class I injection wells. The injection wells are regulated under a separate authority.

Historically, the facility has handled aqueous hazardous wastes (mostly acids) and waste oils. These two waste types were treated together in 12 large surface impoundments at the facility. The oil was skimmed, graded, and resold. The aqueous waste was deep well injected. These waste disposal practices continued until 1983.

CWM currently receives a large variety of liquid hazardous wastes. The generic waste type can be classified as waste pickle liquors (dilute hydrochloric, sulfuric and chromic acids), hydrofluoric and nitric acid wastes, caustic wastes, neutral waters (organic waste waters), and other aqueous wastes generated on-site (waste pile leachate, water from Ponds 11

and 12). In the future, CWM-Vickery hopes to also treat and dispose of oil wastes, slurries and drummed wastes.

On-site there are also various units that were regulated in the past, but are currently undergoing closure or awaiting certification of closure. They are a landfill (425,000 cubic yards), a waste pile (330,000 cubic yards), and several storage surface impoundments (161.5 million gallons). The surface impoundments (100,000 gallons/day) were also used for treatment of waste in the past.

The Federal HSWA permit requires CWM-Vickery to address corrective action for releases of hazardous waste or hazardous constituents from SWMUs. Based on the evidence of past and potential releases from SWMUs and the historical lack of secondary containment, and documented releases of contaminants to the environment, the U.S. EPA required the facility to implement corrective action at the facility.

## Description of Tasks:

- (a) Assist the U.S. EPA in the review of the draft and final RFI reports.
- (b) Assist the U.S. EPA in the review of the Interim Measures and Stabilization Report.
- (c) Assist the U.S. EPA in the review of the draft and final CMS workplans developed by CWM-Vickery.
- (d) Assist the U.S. EPA as the on-site coordinator during the performance of the RFI, interim measures and stabilization. This will include documentation, oversight, and inspection of any work performed by CWM-Vickery or their contractors. The on-site coordinator will notify EPA immediately upon determination that a discrepancy exists between work being performed and the EPA approved workplans.
- (e) Collect split samples (soil and water) in conjunction with oversight of field activities at the site and transfer of the samples to an approved CLP lab for analysis. This task also includes the validation of data submitted by the analytical lab.

## 4. <u>Deliverables Required:</u>

- (a) Provide the U.S. EPA with written comments on the RFI reports.
- (b) Provide the U.S. EPA with written comments on the Interim Measures and Stabilization Report.
- (c) Provide the U.S. EPA with written comments on the CMS workplans.
- (d) Monthly (or as needed) briefings by telephone will be provided to the U.S. EPA in the progress on any substantive issues regarding the project.

- (e) Letter reports will be provided to the U.S. EPA on any field oversight activities.
- (f) Assist EPA in the review of any additional reports or plans submitted by Envirosafe to comply with corrective action permit conditions, or permitting requirements.
- (g) Participate in conference calls and/or meetings with the facility or interested members of the public on corrective action activities.
- (h) Review of miscellaneous technical documents submitted by the facility or interested members of the public on corrective action or permits requirements.

## 5. Schedule for Task Completion:

- (a) Provide the U.S. EPA with written comments on the draft and final RFI reports within 30 days of receipt.
- (b) Provide the U.S. EPA with written comments on the Interim Measures and Stabilization reports within 30 days of receipt.
- (c) Provide the U.S. EPA with written comments on the draft and final CMS workplans within 30 days of receipt.
- (d) Provide the U.S. EPA with letter reports on field oversight activities within 15 days of receipt.
- (e) Provide the U.S. EPA with all sampling data information along with data validation summary within 10 days after receipt of analytical results.

## 6. Anticipated Travel Requirements:

Travel will be required to the CWM-Vickery facility periodically during the RFI, CMS Interim Measures and Stabilization activities. Travel associated with collection of split samples will be conducted at the same time as the oversight activities.

#### 7. Level of Effort:

The estimated level of effort to complete this work assignment is 1200 hours.

The U.S. EPA primary contact is Thomas Matheson, at (312) 886-7569.

# STATEMENT OF WORK BRITISH PETROLEUM OIL COMPANY - TOLEDO REFINERY OREGON, OHIO OHD 005 057 542

## 1. Objective:

The objectives of this NEPA contract are:

- (a) To obtain the services of an environmental professional who is experienced in evaluating the technical aspects of corrective action alternatives at hazardous waste sites. The professional will be responsible for reviewing and providing comments on the technical aspects of workplans and reports developed by British Petroleum Oil Company - Toledo Refinery (BP-Toledo), as part of the corrective action activity at the site;
- (b) To obtain the services of one or more persons experienced in field activities associated with corrective action investigations and remediations. This person(s) will be responsible for over-sight and inspection of field activities associated with the RFI, CMS and any interim measures at the site; and
- (c) To obtain the services of an expert hydrogeologist, to review and comment on corrective action activities to be conducted by BP-Toledo under the terms of the Federal RCRA permit. This expert must also be capable of presenting expert testimony.
- (d) To collect split samples from the sampling team during field activities and the submittal of those samples to a Regionally approved CLP lab for analysis. Data validation is also included in the task assignment.

#### 2. Background:

The BP-Toledo facility is located on Ceder Point Road in Oregon, Ohio. The facility consists of approximately 465 acres. Refinery activities, conducted on-site since 1920, includes the production of gasoline, turbine fuel, distillate fuels, aviation gasoline, asphalt, coke, light petroleum gas, propylene, carbon dioxide, and sulfer.

In December 1988, the U.S. EPA issued a Federal RCRA permit for container storage at BP-Toledo. As a condition of the permit, the U.S. EPA required the facility to undertake corrective action for releases of hazardous waste or constituents from 53 SWMUs on site.

## 3. Description of Tasks:

- (a) Assist the U.S. EPA in the review of the draft and final RFI reports.
- (b) Assist the U.S. EPA in the review of the Interim Measures and Stabilization Report.
- (c) Assist the U.S. EPA in the review of the draft and final CMS workplans developed by BP-Toledo.

- (d) Assist the U.S. EPA as the on-site coordinator during the performance of the RFI, interim measures and stabilization. This will include documentation, oversight, and inspection of any work performed by BP-Toledo or their contractors. The on-site coordinator will notify EPA immediately upon determination that a discrepancy exists between work being performed and the EPA approved workplans.
- (e) Collect split samples (soil and water) in conjunction with oversight of field activities at the site and transfer of the samples to an approved CLP lab for analysis. This task also includes the validation of data submitted by the analytical lab.

## 4. <u>Deliverables Required:</u>

- (a) Provide the U.S. EPA with written comments on the RFI reports.
- (b) Provide the U.S. EPA with written comments on the Interim Measures and Stabilization Report.
- (c) Provide the U.S. EPA with written comments on the CMS workplans.
- (d) Monthly (or as needed) briefings by telephone will be provided to the U.S. EPA in the progress on any substantive issues regarding the project.
- (e) Letter reports will be provided to the U.S. EPA on any field oversight activities.
- (f) Assist EPA in the review of any additional reports or plans submitted by Envirosafe to comply with corrective action permit conditions, or permitting requirements.
- (g) Participate in conference calls and/or meetings with the facility or interested members of the public on corrective action activities.
- (h) Review of miscellaneous technical documents submitted by the facility or interested members of the public on corrective action or permits requirements.

## 5. Schedule for Task Completion:

- (a) Provide the U.S. EPA with written comments on the draft and final RFI reports within 30 days of receipt.
- (b) Provide the U.S. EPA with written comments on the Interim Measures and Stabilization reports within 30 days of receipt.
- (c) Provide the U.S. EPA with written comments on the draft and final CMS workplans within 30 days of receipt.

- (d) Provide the U.S. EPA with letter reports on field oversight activities within 15 days of receipt.
- (e) Provide the U.S. EPA with all sampling data information along with data validation summary within 10 days after receipt of analytical results.

## 6. Anticipated Travel Requirements:

Travel will be required to the BP-Toledo facility periodically during the RFI, CMS, and Interim Measures and Stabilization activities. Travel associated with collection of split samples will be conducted at the same time as the oversight activities.

### 7. Level of Effort:

The estimated level of effort to complete this work assignment is 1,000 hours.

The U.S. EPA primary contact is Thomas Matheson, at (312) 886-7569.